

**REMARKS**

Claims 1-29 and 32 -34 are currently pending in this application. Claims 6 to 13 and 18 to 29 have been withdrawn. Claims 17, 30 and 31 are cancelled, claims 1-5, 14, 16 and 32 are amended to clarify the invention. New claims 33 and 34 are introduced. Support for the amendments can be found throughout the specification and drawings, and in particular paragraphs 0027 and 0028 of Patent Publication No. 2005/0076593. Accordingly, no new matter has been introduced.

In the Office Action, the Examiner rejects claims 1 to 5 and 30 to 31 under 35 U.S.C. §102(b) as being anticipated by Heung Bin. Applicants traverse.

Hueng Bin discloses a safeguard for a glass door, which serves functions of windshield, soundproofing and safety. The glass door includes a fixing member (10) configured to be slidingly engaged on the outer surface of the glass panel of door 15 and secured with silicone 11. The fixing member (10) further includes a depot to receive an extension of a buffering member 20 which has a cavity (20b) filled with sponge material (21). Hueng Bin does not disclose the features of the edge construction of amended claim 1 or the additional features of dependent claims 2 to 5. In particular, Heung Bin does not disclose or suggest a replaceable stile member configured to be readily removable from a core member of a door. Indeed, Hueng Bin does not teach or suggest a stile member at all. Moreover, Hueng Bin does not teach or suggest a stile member having indents in first and second opposing longitudinal inner edges and a cover disposed on the outer surface of the stile member and having first and second opposing flanges received in the indents of the inner edges of the stile member, as recited in claim 1.

Moreover, the Hueng Bin actually teaches away from a stile member having a longitudinally extending tapered spline of said replaceable stile member engaged to a permanent part of a door by a tongue and groove connection. Indeed, the buffering member 20 of Hueng Bin is not engaged to a permanent part of a door by a tongue-and-groove connection. The fixing member 10 is a necessary component of Hueng Bin because the only door suggested is one of glass.

In sum, Hueng Bin neither discloses or suggests the replaceable stile member nor the cover of present claims 1 to 5. Further, as claims 30 and 31 are canceled, the rejection of those claims are rendered moot. Applicants requests that the rejection to claims 1 to 5 under 35 U.S.C. § 102(b) over Hueng Bin be withdrawn.

In the Office Action, the Examiner rejects claims 14 and 32 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,643,991 to Moyes. Applicants traverse.

Moyes is directed to a fire door formed of resin bonded exfoliated vermiculite in which the density of the core exceeds the density of the stiles and rails. The fire door has protective layers overlying intumescent material deposited in grooves formed in the facing edges of the stile. As best illustrated in Figure 5B of Moyes the edge construction of the door has a core (301) and one stile (302) matingly engaged to each other. The stile member of Moyes does not include a longitudinal indent along opposing longitudinal inner edges of the spline member. Nor does Moyes disclose or suggest a cover including first and second opposing flanges received in the indents formed in the first and second longitudinal inner edges of a replaceable stile member. Accordingly, Moyes does not disclose or suggest every feature of present claim 14 and dependent claim 32. As such, Applicants submit that Moyes does not anticipate or render

obvious claims 14 and 32 and respectfully request that the rejection to these claims be withdrawn.

Claim 15 is rejected under 35 U.S.C. § 103(a) as being obvious over Moyes in view of U.S. Publication No. 2002/0124494 to Fortin. Applicants traverse.

Claim 15 recites that the door edge construction further includes a removable fastening means releasably securing the first stile member to the vertical edge. In addition to Moyes not disclosing or suggesting the features of the stile member and cover discussed above, it also does not disclose or suggest a releasable fastening means. Rather Moyes teaches that the stile is adhesively secured to the edges of the core. (Col. 2, ll. 55-56). Even when combined with Fortin, the claim 15 is not rendered obvious. Indeed, Fortin fails to remedy the deficiencies of Moyes.

Fortin describes a method of reinforcing the stile to receive hinge screws on fire doors by using a combination of glass-reinforced members and hardwood of various densities. Like Moyes, Fortin also fails to teach or suggest a stile member having longitudinal indents along opposing inner edges and a cover having flanges received in the longitudinal indents of the spline member. Additionally, Fortin also fails to disclose or suggest a spline member having a longitudinal spline matingly engaged with a door. According, Fortin has many deficiencies of its own and when combined with Moyes does not teach or suggest all of the features of claim 15. For at least these reasons, Moyes and Fortin taken alone or in combination does not render claim 15 obvious. Therefore, Applicant respectfully requests that the rejection to claim 15 be withdrawn.

Claims 16 and 17 are rejected under 35 U.S.C. § 103(a) as being obvious over Moyes in view of U.S. Patent No. 3,271,919 to Olton. Applicants traverse.

Like Fortin, Olton does not remedy the deficiencies of Moyes. Olton fails to disclose or suggest a door having a separate stile member having a longitudinal spline mating with a groove in said vertical edge of a door to form a tongue-and-groove coupling between said vertical edge of the door and said separate stile member such the separate stile member is readily removable from the vertical edge of the door, as recited in independent claim 14. Olton also fails to disclose or suggest a cover member disposed over an outer surface of the stile member described above. Indeed, Olton merely discloses and teaches a door having milled opposing surfaces and a protector element slidingly engaged on the edge of the door such that the opposing edges of the protector are received in the opposing milled surfaces of the door. Assuming *arguendo* that the protector of Olton is construed as the “cover” recited in claim 14, then Olton fails to disclose or suggest a replaceable stile member having a longitudinal spline mating with a groove in a vertical edge of a door, as recited in independent claim 14. Conversely, if the protector of Olton is construed as the “stile member,” then Olton fails to disclose or suggest the recited cover member. Olton merely discloses an edge protector designed to conform to the edge portion of a generally conventional door. For at least these reasons, Moyes in view of Olton does not render obvious claim 16. Moreover, as claim 17 is canceled the rejection of that claim is moot. Accordingly, Applicant respectfully requests that the rejection to claim 16 be withdrawn.

## CONCLUSION

Applicant submits that the present claims are novel and not obvious over the prior art of record and that the application is in condition for allowance. If the Examiner does not agree,

Applicant requests a formal interview with the Examiner and invite the Examiner to call the undersigned to discuss the patentability of the present claims.

Applicant authorizes the Commissioner to charge any fees and/or credit any overpayments associated with this paper including any required fee for an extension of time pursuant to 37 C.F.R. 1.136 to Baker Botts, L.L.P. Deposit Account No. 02-4377.

Respectfully submitted,

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